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Rachel Perillo

November 2, 2020

By ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Mustapha Raji
19 Cr. 870 (JMF)

Dear Judge Furman:

I am the attorney for Mustapha Raji, the defendant in the above-referenced matter. Mr. Raji is currently on pretrial release pursuant to a \$100,000 personal recognizance bond co-signed by two financially responsible persons and one moral suasion co-signer, and secured by \$10,000 in collateral. He is currently residing at his home in Hollywood, Florida, and his conditions of release include, among other things, home incarceration and travel restricted to the Southern and Eastern Districts of New York, and the Southern and Middle Districts of Florida. This letter is respectfully submitted with the consent of Pretrial Services of the Southern District of Florida, and without objection from the government, by AUSA Dina McCleod, to request a bond modification that would permit Mr. Raji to leave his home for the purpose of prescribed medical treatment.

As the Court is aware, Mr. Raji has been receiving medical treatment for his heart condition, among other issues. As part of his treatment, his doctor prescribed that he go for a walk for thirty minutes per day, 3-5x a week (*see* Exhibit A). Mr. Raji therefore seeks a bond modification that would permit him to leave his home for this purpose. My office has conferred with Mr. Raji's Pretrial Services Officer in the Southern District of Florida, Jason Jacoby, who requested that Mr. Raji create a set schedule for his walks. He consents to the following schedule, so long as the Court approves:

Monday: 7:00 a.m. (15 minutes); and 3:00 p.m. (15 minutes)
Wednesday: 7:00 a.m. (15 minutes); and 3:00 p.m. (15 minutes)
Friday: 7:00 a.m. (15 minutes); and 3:00 p.m. (15 minutes)
Saturday: 3:00 p.m. (30 minutes)
Sunday: 3:00 p.m. (30 minutes)

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If the Court has any questions regarding this application, please contact my office.

Respectfully submitted,

/s/

Jeremy Schneider

cc: AUSA Dina McCleod (By ECF)
AUSA Eun Young Choi (By ECF)
USPO Jason Jacoby (By ECF)